

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

ERNEST BLAIR, ESQ. - NJ ATTORNEY ID NO. 036071983  
LAW OFFICES OF KARIM ARZADI  
163 Market Street  
Perth Amboy, New Jersey 08861  
(732) 442-5900  
Attorney for Plaintiffs

MOSAMMAT AKHTER and MOHAMMAD	:	Civil Action No.:
KARIM, H/W and JAWAD KARIM,	:	
Individually,	:	
	:	
Plaintiffs,	:	
	:	
vs.	:	
	:	COMPLAINT AND JURY DEMAND
JOHN PATRICK MOONEY, UNITED	:	
PARCEL SERVICE, RICHARD ROES	:	
1-10 (fictitious names), JOHN	:	
DOES 1-10 (fictitious names)	:	
and ABC COMPANIES, INC. 1-10	:	
(fictitious names),	:	
	:	
Defendants.	:	
	x	

**I. PARTIES**

1. Plaintiff, Mosammat Akhter, residing at 115 Ravendell Way,  
Edison, New Jersey 08817.

2. Plaintiff, Mohammad Karim, residing at 115 Ravendell Way,  
Edison, New Jersey 08817.

3. Plaintiff, Jawad Karim, residing at 115 Ravendell Way,  
Edison, New Jersey 08817.

4. Defendant, John Patrick Mooney, residing at 530 Caplis Sligo  
Road, Bossier City, Louisiana 71112.

5. Defendant, United Parcel Service, residing at 3343 Coliseum  
Boulevard, Fort Wayne, Indiana 46808.

## II. JURISDICTION

6. Jurisdiction is founded on diversity of citizenship and amount. Plaintiffs are citizens of the State of New Jersey, the Defendant, John Patrick Mooney is a citizen of the State of Louisiana and Defendant, United Parcel Service, is citizen of the State of Indiana. The matter in controversy exceeds, exclusive of interest and costs, the sum specified by 28 U.S.C. § 1332.

## III. VENUE

7. Plaintiffs, Mosammat Akhter and Mohammad Karim, H/W and Jawad Karim, resides at 115 Ravendell Way, Edison, New Jersey 08817.

8. Therefore, pursuant to 28 U.S.C. Section 1402(b), venue lies in the District of New Jersey.

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### **AS TO THE CLAIM OF PLAINTIFF, MOSAMMAT AKHTER AND MOHAMMED KARIM**

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#### FIRST COUNT

1. On or about June 6, 2019, the Plaintiff, Mosammat Akhter, was the operator of a certain motor vehicle which was proceeding in an easterly direction along IH-20, in the County of Harrison and State of Texas.

2. At the time and place aforesaid, the Defendant, United Parcel Service, was the owner of a certain motor vehicle which was being operated by its agent, servant and/or employee, the Defendant, John Patrick Mooney, proceeding in an easterly direction along IH-20, in the County of Harrison and State of Texas.

3. At the time and place aforesaid, the Defendant(s), John Does

1-10 and/or ABC Companies, Inc. 1-10, (fictitious names), was/were the owner(s) of a certain motor vehicle(s) which was/were being operated by his/her/its agent(s), servant(s) and/or employee(s), the Defendant(s), Richard Roes 1-10 (fictitious names), along the aforesaid roadway(s).

4. The aforesaid Defendant(s), John Does 1-10, Richard Roes 1-10 and/or ABC Companies, Inc. 1-10, are fictitious names intended to identify any and all parties including individuals, corporations and/or other entities whose identities are presently unknown to the Plaintiff who together with the named Defendants, were the owners and/or operators of vehicles upon the aforesaid roadways and whose negligence contributed to Plaintiff's injuries.

5. At the time and place aforesaid, the Defendants, or either of them, so negligently operated and/or maintained and/or controlled their motor vehicles as to cause same to strike and collide with the vehicle that the Plaintiff was operating.

6. As a direct and proximate result of the aforesaid negligence of the Defendants, or either of them, the Plaintiff, Mosammat Akhter, sustained serious and permanent physical injuries, suffered, still suffers and will continue to suffer from great physical pain and mental anguish, was confined, is and will continue to be so confined, was obliged, still is, and will in the future be obligated to expend large sums of money for medical and other needed care of the aforesaid injuries, was prevented, is, and will in the future be prevented from pursuing her usual course of conduct and employment and in the future will be caused great pain and suffering, to her great loss and damage.

**WHEREFORE**, the Plaintiff, Mosammat Akhter, demands judgment against the Defendants, John Patrick Mooney, United Parcel Service, John Does 1-10 (fictitious names), Richard Roes 1-10 (fictitious names) and ABC Companies, Inc. 1-10 (fictitious names), either jointly, severally or in the alternative, for damages, together with interest and costs of this suit.

**SECOND COUNT**

1. The Plaintiff, Mohammad Karim, repeats the allegations contained in the First Count of the Complaint and makes same a part hereof as though more fully set forth at length herein.

2. The Plaintiff, Mohammad Karim, is the husband of Mosammat Akhter, the injured Plaintiff.

3. As a direct and proximate result of the aforesaid negligence of the Defendants, or either of them, the Plaintiff, Mohammad Karim, will be deprived of the consortium and services of the Plaintiff, Mosammat Akhter.

**WHEREFORE**, the Plaintiff, Mohammad Karim, demands judgment against the Defendants, John Patrick Mooney, United Parcel Service, John Does 1-10 (fictitious names), Richard Roes 1-10 (fictitious names) and ABC Companies, Inc. 1-10 (fictitious names), either jointly, severally or in the alternative, for damages, together with interest and costs of this suit.

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**AS TO CLAIM OF PLAINTIFF, JAWAD KARIM**

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**THIRD COUNT**

1. On or about June 6, 2019, the Plaintiff, Jawad Karim, was the passenger of a certain motor vehicle operated by Mosammat Akter which was proceeding in an easterly direction along IH-20, in the County of Harrison and State of Texas.

2. At the time and place aforesaid, the Defendant, United Parcel Service, was the owner of a certain motor vehicle which was being operated by its agent, servant and/or employee, the Defendant, John Patrick Mooney, proceeding in an easterly direction along IH-20, in the County of Harrison and State of Texas.

3. At the time and place aforesaid, the Defendant(s), John Does 1-10 and/or ABC Companies, Inc. 1-10, (fictitious names), was/were the owner(s) of a certain motor vehicle(s) which was/were being operated by his/her/its agent(s), servant(s) and/or employee(s), the Defendant(s), Richard Roes 1-10 (fictitious names), along the aforesaid roadway(s).

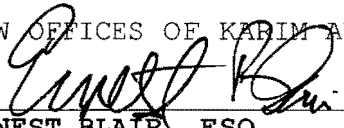
4. The aforesaid Defendant(s), John Does 1-10, Richard Roes 1-10 and/or ABC Companies, Inc. 1-10, are fictitious names intended to identify any and all parties including individuals, corporations and/or other entities whose identities are presently unknown to the Plaintiff who together with the named Defendants, were the owners and/or operators of vehicles upon the aforesaid roadways and whose negligence contributed to Plaintiff's injuries.

5. At the time and place aforesaid, the Defendants, or either of them, so negligently operated and/or maintained and/or controlled their motor vehicles as to cause same to strike and collide with the vehicle in which Plaintiff was a passenger.

6. As a direct and proximate result of the aforesaid negligence of the Defendants, or either of them, the Plaintiff, Jawad Karim, sustained serious and permanent physical injuries, suffered, still suffers and will continue to suffer from great physical pain and mental anguish, was confined, is and will continue to be so confined, was obliged, still is, and will in the future be obligated to expend large sums of money for medical and other needed care of the aforesaid injuries, was prevented, is, and will in the future be prevented from pursuing his usual course of conduct and employment and in the future will be caused great pain and suffering, to his great loss and damage.

**WHEREFORE**, the Plaintiff, Jawad Karim, demands judgment against the Defendants, John Patrick Mooney, United Parcel Service, John Does 1-10 (fictitious names), Richard Roes 1-10 (fictitious names) and ABC Companies, Inc. 1-10 (fictitious names), either jointly, severally or in the alternative, for damages, together with interest and costs of this suit.

Dated: October 23, 2020

LAW OFFICES OF KARIM ARZADI  
  
ERNEST BLAIR, ESQ.  
Attorney for Plaintiffs

**DEMAND FOR TRIAL BY JURY**

The Plaintiffs demand a trial by jury as to all issues herein.

Dated: October 23, 2020

LAW OFFICES OF KARIM ARZADI  
  
ERNEST BLAIR, ESQ.  
Attorney for Plaintiffs